

FILED OCT 10 2018

UNITED STATES DISTRICT COURT

for the
Western District of MissouriUnited States of America
v.
SEGUN PROSPER OTARU
[DOB: 09-26-1992]

Case No.

18-mj-8071 DPR

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 12, 2018 in the county of Webster in the
Western District of Missouri, the defendant(s) violated:

Code Section

Title 18, U.S.C., Section 1344
(2)

Offense Description

Regions Bank, headquartered at 1900 Fifth Avenue North, in Birmingham, Alabama, with a branch office located at 2927 South Campbell Avenue, in Springfield, Missouri, was a financial institution as that term was defined in Title 18, United States Code, Section 20(1), since it was an insured depository institution under the Federal Deposit Insurance Act, Title 12, United States Code, Section 1813(c)(2). Between a date unknown to the United States and on or about October 9, 2018, the defendant, SEGUN PROSPER OTARU, devised and executed a scheme to defraud Regions Bank, and to obtain moneys, funds and other property owned by, and under the custody and control of Regions Bank by means of false and fraudulent pretenses, representations and promises, in that the defendant opened an account in the name of "Simon Augustus," using false identification documents bearing his photograph and the name "Simon Augustus," and received and attempted to receive numerous wire transfers of funds to that account. On or about October 9, 2018, in Greene County, Missouri, in the Western District of Missouri, the defendant, SEGUN PROSPER OTARU, for the purpose of executing the above-described scheme to defraud and to obtain by means of false and fraudulent pretenses, representations and promises, moneys, funds and property owned by and under the custody and control of Regions Bank, represented himself to be and presented an identification card in the name of "Simon Augustus" in order to claim a wire transfer in the approximate amount of \$4,680; all in violation of Title 18, United States Code, Section 1344(2).

This criminal complaint is based on these facts:

See attached Affidavit of Gregory Bowie.

☒ Continued on the attached sheet.

Complainant's signature

Gregory Bowie, Special Agent, Homeland Security Investigations

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/10/2018

Judge's signature

City and state: Springfield, Missouri

David P. Rush, U.S. Magistrate Judge

Printed name and title